

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON DIVISION**

TARA KING, ED.D., individually and on behalf of her patients, **RONALD NEWMAN, PH.D.**, individually and on behalf of his patients, **NATIONAL ASSOCIATION FOR RESEARCH AND THERAPY OF HOMOSEXUALITY (NARTH)**, **AMERICAN ASSOCIATION OF CHRISTIAN COUNSELORS (AACC)**,

Plaintiffs,

v.

Case No. 13-cv-5308

CHRISTOPHER J. CHRISTIE, Governor of the State of New Jersey, in his official capacity, **ERIC T. KANEFSKY**, Director of the New Jersey Department of Law and Public Safety: Division of Consumer Affairs, in his official capacity, **MILAGROS COLLAZO**, Executive Director of the New Jersey Board of Marriage and Family Therapy Examiners, in her official capacity, **J. MICHAEL WALKER**, Executive Director of the New Jersey Board of Psychological Examiners, in his official capacity, **PAUL JORDAN**, President of the New Jersey State Board of Medical Examiners, in his official capacity,

Defendants.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE JOINT REPLY AND/OR EXCEED
PAGE LIMIT**

COME NOW Plaintiffs and respectfully submit this Motion for Leave to File a Joint Reply or Exceed the Page Limit. In support thereof Plaintiffs show:

1) Pursuant to this Court's Order dated September 16, 2013 (Dkt. 31), Defendant, State of New Jersey, and Intervenor-Defendant, Garden State Equality, filed their Cross-Motions for Summary Judgment on September 13, 2013.

2) Pursuant to this Court's Scheduling Order (Dkt. 26), Plaintiffs file their Reply Memorandum simultaneously with this Motion.

3) Pursuant to Local Rule 7.1(h), Plaintiffs' reply memoranda are limited to forty (40) pages each.

4) Defendants' and Intervenor-Defendants' Cross-Motions to for Summary Judgment (Dkt. 29, 30) consists of a combined seventy-two (72) pages of argument and combined with exhibits and supporting declarations totals five-hundred and twenty-nine (529) pages.

5) In addition, because of the size of Defendants' and Intervenor-Defendants' cross-motions for summary judgment and the many and voluminous exhibits and declarations, and the fact that Plaintiffs are entitled to respond to each separately, in the interest of judicial economy and to prevent duplicative arguments in individual responses to both Cross-Motions, Plaintiffs file this Motion for Leave to File a combined Reply Memorandum/Opposition to both Defendant's and Intervenor-Defendants' Cross-Motions. Plaintiffs' Reply Memorandum/Opposition totals only fifty-seven (57), which is significantly under the combined total that would have been appropriate for separate responses to each cross-motion.

WHEREFORE, for good cause shown, Plaintiffs' respectfully request that this Motion be granted, and that the Court accept Plaintiffs Joint Reply to both Defendants' and Intervenor-Defendants' Cross-Motions for Summary Judgment or in the alternative grant Plaintiffs' motion to exceed the page limit.

Respectfully submitted,

/s/ Demetrios Stratis

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed electronically with the court on September 20, 2013. Service will be effectuated by the Court's electronic notification system upon all counsel of record.

/s/ Demetrios Stratis
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